

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY TO INTERROGATORIES OF KESPAN ENERGY REDIRECT  
FROM WITNESS BOZZO  
(KE/USPS-T14-2(b)-(d), 3(b)-(d), 4(b)-(d), and 5)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Kesper Energy redirected from witness Bozzo: KE/USPS-T14-2(b)-(d), 3(b)-(d), 4(b)-(d), and 5, filed on November 5, 2001.

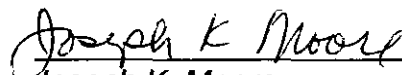
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Joseph K. Moore

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(202) 268-3078, Fax -5402  
November 19, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF KEYSpan ENERGY REDIRECTED FROM  
WITNESS BOZZO**

**KE/USPS-T-14-2** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the outgoing BCS secondary operation.

- B. Please provide all of the reasons that cause the outgoing BCS secondary operation to reject 4.0% of the pieces.
- C. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be less likely to be rejected than CEM letters that are not pre-approved? Please explain your answer.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than letters that were barcoded by the Postal Service in the RBCS? Please explain your answer.

**Response:**

- B. See response to MMA/USPS-T-14-1 C.
- C. See response to MMA/USPS-T-14-1 D.
- D. See response to MMA/USPS-T-14-1 E.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF KEYSpan ENERGY REDIRECTED FROM  
WITNESS BOZZO**

**KE/USPS-T-14-3** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the incoming BCS MMP operation.

- B. Please provide all of the reasons that cause the incoming BCS MMP operation to reject 4.0% of the pieces.
- C. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than CEM letters that are not pre-approved? Please explain your answer.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than letters that were barcoded by the Postal Service in the RBCS operation? Please explain your answer.

**Response:**

- B. See response to MMA/USPS-T-14-1 C.
- C. See response to MMA/USPS-T-14-1 D.
- D. See response to MMA/USPS-T-14-1 E.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF KEYSpan ENERGY REDIRECTED FROM  
WITNESS BOZZO**

**KE/USPS-T-14-4** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the incoming BCS SCF/primary operation.

- B. Please provide all of the reasons that cause the incoming BCS SCF/primary operation to reject 4.0% of the pieces.
- C. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than CEM for which there has been no pre-approval? Please explain your answer.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than letters that were barcoded by the Postal Service in the RBCS operation? Please explain your answer.

**Response:**

- B. See response to MMA/USPS-T-14-1 C.
- C. See response to MMA/USPS-T-14-1 D.
- D. See response to MMA/USPS-T-14-1 E.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF KESPAN ENERGY REDIRECTED FROM  
WITNESS BOZZO

**KE/USPS-T-14-5** Please rank the following types of letters according to the relative difficulty that postal automation equipment has in processing the type of letter and the likelihood that such letters will be rejected. Please give the reasons for the rankings provided in your answer.

- A. Handwritten addressed letters:
- B. Machine printed addressed letters;
- C. Prebarcoded machine printed addressed letters that have not been pre- approved by Postal Service officials; and
- D. Prebarcoded machine printed addressed letters that are pre-approved by Postal Service officials.

**Response:**

Postal automation equipment has different types of "difficulties" that affect reject rates.

Machinability is the most problematic and address quality is the second (e.g., incomplete address). Assuming these four categories are all machinable, then D. would be the least "difficult" (assuming the customer uses it properly, i.e., does not cover the FIM with a stamp or crosses out the address, but not the barcode, to use the envelope for something else).

Categories A., B., and C. would be ranked second very close behind D. Given our ability to barcode mail, I know of no studies and I have no personal experience, which show that anyone of these categories are likely to reject more than the others.

### DECLARATION

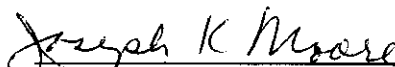
I, Linda A. Kingsley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
LINDA A. KINGSLEY

Dated: 11/19/01

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Joseph K. Moore

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November 19, 2001